

Message

From: Garnett, Desean [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E7FF47BEFA1E4898A9BA3AEB77D31EE1-DGARNETT]
Sent: 10/7/2020 11:01:10 PM
To: Pierce, Jennifer [pierce.jennifer@epa.gov]
Subject: RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application
Attachments: email to Natalie re ESA and NHPA reqs.docx

Privileged/confidential – attorney client

Hi Jenny,

Thanks for putting this together and inquiring about this issue with the folks in our sections. Attached are my suggested edits. I'm still learning these regs so let me know if my edits need clarification.

Desean Garnett
Attorney-Advisor
U.S. EPA Region 9
(415) 972-3046

From: Pierce, Jennifer <pierce.jennifer@epa.gov>
Sent: Tuesday, October 6, 2020 5:04 PM
To: Garnett, Desean <Garnett.Desean@epa.gov>
Subject: FW: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Privileged/confidential – attorney client

Hi Desean,

I put together this summary for Calvin. Let me know if you have any changes or suggestions. Thanks!

—
Hi Natalie,

Ex. 5 Attorney Client (AC)

Jenny

Assistant Regional Counsel
EPA Region 9, Office of the Regional Counsel
Direct: (415) 972-3883

This email, including attachments, may contain information that is confidential and/or protected by the attorney/client, attorney work product, or other privileges.

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Tuesday, October 6, 2020 1:33 PM
To: Pierce, Jennifer <pierce.jennifer@epa.gov>; Garnett, Desean <Garnett.Desean@epa.gov>
Subject: RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Jenny,

Ex. 5 Attorney Client (AC)

A summary of the information that I can send over to Natalie will be helpful.

Calvin

From: Pierce, Jennifer <pierce.jennifer@epa.gov>
Sent: Monday, October 5, 2020 10:46 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Garnett, Desean <Garnett.Desean@epa.gov>
Subject: RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Privileged/confidential – attorney client

Hi Calvin,

Ex. 5 Attorney Client (AC)

Ex. 5 Attorney Client (AC)

Ex. 5 Attorney Client (AC)

—
Jenny

Jennifer Pierce
Assistant Regional Counsel
U.S. EPA, Region 9
Office of Regional Counsel
75 Hawthorne Street, 12th Floor
San Francisco, CA 94105
Mail Code: R9-ORC-2-3
(415) 972-3883

This email, including attachments, may contain information that is confidential and/or protected by the attorney/client, attorney work product, or other privileges.

From: Pierce, Jennifer
Sent: Monday, September 14, 2020 3:06 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Garnett, Desean <Garnett.Desean@epa.gov>
Subject: RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Privileged/confidential – attorney client

Hi Calvin,

Circling back about this.

Ex. 5 Attorney Client (AC)

Ex. 5 Attorney Client (AC)

If Natalie would like a call to discuss, I am happy to arrange that. Otherwise, let me know if you have any questions!

Jenny

Assistant Regional Counsel
EPA Region 9, Office of the Regional Counsel
Direct: (415) 972-3883

This email, including attachments, may contain information that is confidential and/or protected by the attorney/client, attorney work product, or other privileges.

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Thursday, September 10, 2020 5:27 PM
To: Pierce, Jennifer <pierce.jennifer@epa.gov>; Garnett, Desean <Garnett.Desean@epa.gov>
Subject: RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Jenny,

Ex. 5 Attorney Client (AC)

Calvin

From: Pierce, Jennifer <pierce.jennifer@epa.gov>
Sent: Thursday, September 10, 2020 4:21 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Garnett, Desean <Garnett.Desean@epa.gov>
Subject: RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Calvin,

Ex. 5 Attorney Client (AC)

Jenny

Assistant Regional Counsel
EPA Region 9, Office of the Regional Counsel
Direct: (415) 972-3883

This email, including attachments, may contain information that is confidential and/or protected by the attorney/client, attorney work product, or other privileges.

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Thursday, September 10, 2020 3:34 PM
To: Pierce, Jennifer <pierce.jennifer@epa.gov>; Garnett, Desean <Garnett.Desean@epa.gov>
Subject: FW: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Desean/Jenny,

Ex. 5 Attorney Client (AC)

Thanks,
Calvin

Calvin Ho
Groundwater Protection Section
Water Division (WTR-4-2)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3262

From: Natalie Nowiski <NNowiski@slb.com>
Sent: Wednesday, September 9, 2020 1:54 PM
To: Albright, David <Albright.David@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: 'Rebecca Hollis' <rhollis@cleanenergysystems.com>
Subject: RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Dear David and Calvin,

Hope you are doing well.

We are hoping you could provide some clarity on a question that has arisen with respect to the ESA and NHPA requirements.

We are currently ascertaining the parameters of the 3D seismic that will be conducted for the Class VI Permitting application. My understanding is that the required land area for this survey (10 – 18 square miles) will be substantially larger than the AoR itself (2.5 square miles). For the purposes of the ESA and NHPA review, does the analysis need to be performed only on the AoR, or does it need to extend to the property that will be included in the 3D seismic?

A variety of permits will be required to be obtained from various government agencies (city, county, state & federal), which likely will require some form of environmental analysis and other pertinent reviews. We understand that the EPA is not involved in the 3-D seismic permitting process; however, since the data from 3D seismic is required as part of the permitting process, it is an incidental action to the Class VI Permit.

Your advice and guidance on this issue would be very much appreciated.

Best regards,
Natalie

From: Albright, David <Albright.David@epa.gov>
Sent: Wednesday, August 19, 2020 2:11 PM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>; Ho, Yenhung <Ho.Yenhung@epa.gov>

Cc: Natalie Nowiski <NNowiski@slb.com>

Subject: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Rebecca, just to clarify, we are not intending to go over our letter in today's call. The call was requested by Natalie to discuss status and process of our application review and we just happened to get this letter out today. Hope that helps. David

David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne Street
San Francisco, CA 94105
415 972-3971

From: Rebecca Hollis <rhollis@cleanenergysystems.com>

Sent: Wednesday, August 19, 2020 11:57 AM

To: Ho, Yenhung <Ho.Yenhung@epa.gov>

Cc: Albright, David <Albright.David@epa.gov>; Natalie Nowiski <NNowiski@slb.com>

Subject: RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Thank you, Calvin. Received.
I will review as much as possible before our call.

Best Regards,
-Rebecca

Rebecca Hollis
Director Business Development -



3035 Prospect Park Drive, Suite 120

Rancho Cordova, CA 95670

Main: 916-638-7967

Mobile: 916-798-4114 **← please use this number while CES is working remotely**

rhollis@cleanenergysystems.com

The Power to Reverse Climate Change

From: Ho, Yenhung <Ho.Yenhung@epa.gov>

Sent: Wednesday, August 19, 2020 11:28 AM

To: Rebecca Hollis <rhollis@cleanenergysystems.com>

Cc: Albright, David <Albright.David@epa.gov>; Natalie Nowiski <NNowiski@slb.com>

Subject: EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Rebecca,

We will upload the attached EPA site characterization evaluation of CES Class VI permit application to the GSDT at a later time, but are providing you a copy of the document for our call today.

Regards,
Calvin

Calvin Ho
Groundwater Protection Section
Water Division (WTR-4-2)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3262